

Attorneys for Plaintiffs

STIPULATION AND PROPOSED ORDER  
RE: VACATING DEADLINES AND  
TRIAL DATE DUE TO PLAINTIFF  
RICHARD JOHNSON'S DEATH, AND  
MAINTAINING FEBRUARY 4, 2016,  
FURTHER CASE MANAGEMENT  
CONFERENCE

The complaint will also need to be amended to include wrongful death claims, and additional discovery will need to be conducted related to the wrongful death claims. In particular, additional time is required for an autopsy, a procedure that takes several weeks to complete, and to obtain medical records up to and including Mr. JOHNSON's passing. Counsel

1 is in the process of obtaining the requisite authorizations from Mr. JOHNSON's family but,  
2 again, the family needs time. Defendants will also want to take depositions of Mr. JOHNSON's  
3 heirs once the case is amended for wrongful death.

4 Further, it is likely that at least one new defendant will be added to the case once the case  
5 is amended for wrongful death.

6 Parties estimate they will need at least four additional months for discovery beyond the  
7 current discovery deadline. However, parties are reluctant to propose an alternative schedule  
8 until the case is amended and any new defendants are served.

9 The current fact discovery deadline is January 4, 2016.

10 A Further Case Management Conference is set for February 4, 2016.

11 Trial is set for July 11, 2016.

12 Based on the above, good cause exists to vacate the current case schedule and trial date  
13 set forth in the Case Management and Pretrial Order for Jury Trial, Doc. 25. The Further Case  
14 Management Conference set for February 4, 2016, at 10:30 a.m., should remain on calendar.

15 Accordingly, plaintiff MARCELLA JOHNSON and defendants PUGET SOUND  
16 COMMERCE CENTER, INC. (fka TODD SHIPYARDS CORPORATION) and GEORGIA-  
17 PACIFIC LLC have stipulated and agreed that the current case schedule and trial date set forth in  
18 the Case Management and Pretrial Order for Jury Trial, Doc. 25, should be vacated and the  
19 Further Case Management Conference set for February 4, 2016, should remain on calendar.

20 IT IS SO STIPULATED.

21  
22 Dated: December 30, 2015

BRAYTON♦PURCELL LLP

23  
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1 Dated: December 30, 2015

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(fka Todd Shipyards Corporation)

8 Dated: December 30, 2015

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Attorneys for Defendant

Georgia-Pacific LLC

(fka Georgia-Pacific Corporation)

ORDER

For good cause shown, IT IS SO ORDERED that the current case schedule and trial date set forth in the Case Management and Pretrial Order for Jury Trial, Doc. 25, is vacated. The Further Case Management Conference set for February 4, 2016, at 10:30 a.m., ~~will remain on calendar.~~ is rescheduled February 9, 2016 at 10:30 a.m. An updated joint CMC Statement shall be filed by February 2, 2016.  
January 5, 2016

Dated: \_\_\_\_\_

